

Exhibit G

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7 UNITED STATES DISTRICT COURT
8
9 NORTHERN DISTRICT OF CALIFORNIA
10
11 SAN FRANCISCO DIVISION

11 WAYMO LLC,

12 Plaintiffs,

13 vs.

14 UBER TECHNOLOGIES, INC.;
15 OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

Case No.: 3:17-cv-00939-WHA

**NON-PARTY ANTHONY
LEVANDOWSKI'S OBJECTIONS AND
RESPONSES TO WAYMO'S JUNE 23,
2017 SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT INSPECTION
OF PREMISES IN A CIVIL ACTION**

19 Under Rule 45 of the Federal Rules of Civil Procedure, Anthony Levandowski, a non-
20 party to this lawsuit, hereby provides the following objections and responses to the Subpoena to
21 Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil
22 Action (the "Subpoena") directed to Anthony Levandowski served by Plaintiff Waymo LLC
23 ("Waymo"), dated June 23, 2017.

24 **I. PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

25 Mr. Levandowski specifically incorporates each of the following general objections into
26 his responses to each of Waymo's document requests and topics for testimony, whether or not
27 each such general objection is expressly referred to in Mr. Levandowski's response to a specific
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1 request or topic. An agreement to produce responsive documents in the responses below means
2 only that Mr. Levandowski will produce non-privileged documents within his custody or control
3 that he identifies after a reasonable search and diligent inquiry, and is not a representation that
4 any such responsive documents exist.

5 1. Mr. Levandowski objects to the Subpoenas as overbroad and burdensome in that
6 they fail to place any temporal limitation on the scope of the documents requested save requests
7 Nos. 3 and 31.

8 2. Mr. Levandowski objects to any request to the extent that it is vague, overbroad,
9 unduly burdensome, or oppressive, or to the extent it purports to impose upon Mr. Levandowski
10 any duty or obligation that is inconsistent with or in excess of those obligations that are imposed
11 by the Federal Rules of Civil Procedure or the Local Rules. The 2015 amendments to the Federal
12 Rules of Civil Procedure impose strict new limits on discovery, and now obligate the “court and
13 the parties to secure the just, speedy, and inexpensive determination of every action and
14 proceeding.” Fed. R. Civ. P. 1. The Federal Rules now limit the scope of discovery to that which
15 is “relevant to any party’s claim or defense and proportional to the needs of the case, considering
16 the importance of the issues at stake in the action, the amount in controversy, the parties’ relative
17 access to relevant information, the parties’ resources, the importance of the discovery in resolving
18 the issues, and whether the burden or expense of the proposed discovery outweighs its likely
19 benefit. Information within this scope of discovery need not be admissible in evidence to be
20 discoverable.” Fed. R. Civ. P. 26(b)(1). Mr. Levandowski will not comply with any attempt to
21 impose obligations not required by those Rules.

22 3. Mr. Levandowski objects to any request to the extent it seeks information and
23 documents protected from discovery under the attorney-client privilege, the work-product
24 doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or
25 doctrine. The inadvertent production by Mr. Levandowski of any information protected from
26 disclosure by any privilege or doctrine shall *not* constitute a waiver by Mr. Levandowski of such
27 protections. Mr. Levandowski expressly reserves the right to demand the return and/or
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1 destruction of any and all such privilege or protected documents or information inadvertently
2 produced by Mr. Levandowski in this action.

3 4. Mr. Levandowski objects to any instruction or request to the extent that it would
4 impose a duty on Mr. Levandowski to undertake a search for, or an evaluation of, information,
5 documents, or things for which Waymo is equally able to search for and evaluate, including
6 documents that are publicly available, in the possession of parties to this litigation, and/or are
7 already in the possession of Waymo.

8 5. Mr. Levandowski objects to any request to the extent it seeks information and
9 documents outside of Mr. Levandowski's possession, custody, or control. Mr. Levandowski
10 further objects to the Subpoenas to the extent they purport to require production of any materials
11 that are within the possession, custody, or control of Mr. Levandowski's former employer—Uber,
12 or other Uber personnel. Documents possessed by another entity or person are not within the
13 possession, custody, or control of Mr. Levandowski.

14 6. Mr. Levandowski objects to any request that seeks confidential and/or proprietary
15 information, as well as material impinging on the privacy interests of Mr. Levandowski. Mr.
16 Levandowski will produce documents containing such information only subject to the terms of an
17 appropriate protective order pursuant to Fed. R. Civ. P. 26(c).

18 7. Mr. Levandowski objects to any request that seeks material protected from
19 disclosure by Mr. Levandowski's Fifth Amendment privilege. The requests for documents here
20 are so broad as to constitute a fishing expedition and would require Mr. Levandowski to make
21 testimonial acts of production to make a document-by-document response. *See, e.g., United States*
22 *v. Hubbell*, 530 U.S. 27 (2000).

23 8. Mr. Levandowski objects to any request that seeks information that is subject to
24 confidentiality or non-disclosure agreements with third parties. This includes, most importantly,
25 confidentiality and non-disclosure agreements between Mr. Levandowski and his former
26 employer, Uber. Mr. Levandowski will produce such information (1) only to the extent that he is
27 permitted to do so under his agreements, (2) only after those third parties receive appropriate
28 notice and are provided with a reasonable opportunity to raise objections, and (3) only after the

1 Court resolves any such third-party objections. Further, Mr. Levandowski will produce such
2 information only subject to an appropriate protective order under Fed. R. Civ. P.26(c).

3 9. Mr. Levandowski objects to each request and instruction to the extent that the
4 information requested is in the possession of and/or is equally available from Plaintiff Waymo,
5 individually and on behalf of all others similarly situated. It is a matter of well-settled law that a
6 party should first obtain discovery from its opponent before burdening a non-party with discovery
7 requests. *See, e.g., Haworth, Inc. v. Herman Miller, Inc.*, 998 F.2d 975, 978 (Fed. Cir. 1993)
8 (holding that a district court can properly require a party to seek discovery from its party
9 opponent before burdening a non-party with a subpoena); *Medcorp, Inc. v. Pinpoint*
10 *Technologies, Inc.*, No. 08-CV-00867, 2009 WL 2194036, at *4 (D. Colo. July 14, 2009) (“With
11 respect to discovery issued to non-parties, a party seeking discovery must satisfy a burden of
12 proof heavier than the ordinary burden imposed by Rule 26 relating to discovery on any matter
13 relevant to the subject matter involved in the pending action . . . When, as here, discovery
14 identified in the subpoena duces tecum is sought from non-parties, the status of a person as a non-
15 party is a factor of which weighs against disclosure. Given the short period of time in which
16 third-parties have to respond to such subpoenas, particularly when compared to parties to
17 litigation, this level of discovery is not appropriate.”).

18 10. Mr. Levandowski objects to any request that seeks “any” or “all” documents
19 relating to the subject matter of the request as overly broad, unduly burdensome, and oppressive
20 when documents sufficient to show the requested information would satisfy any reasonable
21 discovery need of Defendant.

22 11. Mr. Levandowski objects to each request and instruction to the extent that it is
23 vague, ambiguous, and unclear.

24 12. Mr. Levandowski objects to each request to the extent it requires disclosure from
25 which Mr. Levandowski is entitled to seek protection due to annoyance, embarrassment,
26 oppression, or undue burden and expense.
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1 13. Mr. Levandowski objects to each request and instruction to the extent they call for
2 legal conclusions in order to provide a response and/or produce documents or information.

3 14. Mr. Levandowski objects to each paragraph of the section labeled “Definitions”
4 and to each and every request to the extent they purport to give meaning or legal significance to a
5 document, fact, or purported fact whose meaning or significance is subject to dispute between the
6 parties. Mr. Levandowski further objects to Waymo’s “Definitions” to the extent they (1) render
7 any request vague, overbroad, or unduly burdensome; (2) seek information that is neither relevant
8 to the subject matter of this litigation nor reasonably calculated to lead to the discovery of
9 admissible evidence; or (3) impose obligations or demands on Mr. Levandowski beyond those
10 contemplated by the Federal Rules of Civil Procedure and the applicable Local Rules. Mr.
11 Levandowski’s responses to each of Waymo’s requests shall not constitute an admission or
12 concession to any of the definitions, terms, phrases, assertions, characterizations, or implications
13 contained therein.

14 15. No agreement by Mr. Levandowski to provide information in response to a request
15 shall be construed as a waiver of Mr. Levandowski’s right to object to the use of that information
16 during trial or any other proceeding in this or any other action.

17 16. Mr. Levandowski objects to each paragraph of the section labeled “Instructions” to
18 the extent the instructions (1) render any request vague, overbroad, or unduly burdensome; (2)
19 seek information that is neither relevant to the subject matter of this litigation nor reasonably
20 calculated to lead to the discovery of admissible evidence; or (3) impose obligations and demands
21 on Mr. Levandowski beyond those contemplated by the Federal Rules of Civil Procedure and the
22 applicable Local Rules. Mr. Levandowski will not comply with any attempt to impose
23 obligations not required by those rules.

24 17. Mr. Levandowski reserves the right to assert additional objections to Waymo’s
25 requests, as appropriate.
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II. SPECIFIC OBJECTIONS TO DOCUMENT REQUESTS

REQUEST NO. 1:

All DOCUMENTS and COMMUNICATIONS REGARDING ODIN WAVE and/or TYTO before May 5, 2016.

RESPONSE TO REQUEST NO. 1:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski further objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to the subject matter of this litigation. Mr. Levandowski objects to this request to the extent that it seeks confidential and/or proprietary information.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 2:

All DOCUMENTS and COMMUNICATIONS REGARDING APPARATE INTERNATIONAL.

RESPONSE TO REQUEST NO. 2:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski further objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or

1 doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
 2 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
 3 Mr. Levandowski objects to this request to the extent that it seeks confidential and/or proprietary
 4 information.

5 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

6 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 7 responsive documents, the act of production of which is not protected by the Fifth Amendment.

8 **REQUEST NO. 3:**

9 All DOCUMENTS and COMMUNICATIONS REGARDING UBER before August 23,
 10 2016.

11 **RESPONSE TO REQUEST NO. 3:**

12 Mr. Levandowski incorporates his General Objections above as though set forth in this
 13 response. Mr. Levandowski objects to this request to the extent it seeks information and
 14 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
 15 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
 16 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski further objects to this
 17 request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to the
 18 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
 19 it seeks confidential and/or proprietary information.

20 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

21 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive
 22 documents, the act of production of which is not protected by the Fifth Amendment.

23 **REQUEST NO. 4:**

24 All DOCUMENTS and COMMUNICATIONS REGARDING POUCH HOLDINGS.

25 **RESPONSE TO REQUEST NO. 4:**

26 Mr. Levandowski incorporates his General Objections above as though set forth in this
 27 response. Mr. Levandowski objects to this request because it is not calculated to lead to
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1 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
2 objects to this request to the extent it seeks information and documents protected from discovery
3 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
4 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
5 privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
6 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.

7 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

8 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
9 responsive documents, the act of production of which is not protected by the Fifth Amendment.
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REQUEST NO. 5:

All DOCUMENTS and COMMUNICATIONS REGARDING DOGWOOD LEASING.

RESPONSE TO REQUEST NO. 5:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation. Mr. Levandowski also objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 6:

All DOCUMENTS and COMMUNICATIONS REGARDING SANDSTONE.

RESPONSE TO REQUEST NO. 6:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation. Mr. Levandowski also objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine.

1 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

2 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
3 responsive documents, the act of production of which is not protected by the Fifth Amendment.

4 **REQUEST NO. 7:**

5 All DOCUMENTS REGARDING the formation of OTTOMOTTO, including, without
6 limitation, business formation documents, business plans, and solicitations of investment capital.

7 **RESPONSE TO REQUEST NO. 7:**

8 Mr. Levandowski incorporates his General Objections above as though set forth in this
9 response. Mr. Levandowski objects to this request because it is not calculated to lead to
10 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
11 objects to this request to the extent it seeks information and documents protected from discovery
12 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
13 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
14 privilege or doctrine. Mr. Levandowski further objects to this request to the extent that it seeks
15 confidential and/or proprietary information.

16 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

17 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
18 responsive documents, the act of production of which is not protected by the Fifth Amendment.

19 **REQUEST NO. 8:**

20 All DOCUMENTS REGARDING the formation of OTTO TRUCKING, including,
21 without limitation, business formation documents, business plans, and solicitations of investment
22 capital.

23 **RESPONSE TO REQUEST NO. 8:**

24 Mr. Levandowski incorporates his General Objections above as though set forth in this
25 response. Mr. Levandowski objects to this request because it is not calculated to lead to
26 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
27 objects to this request to the extent it seeks information and documents protected from discovery
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1 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
 2 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
 3 privilege or doctrine. Mr. Levandowski further objects to this request to the extent that it seeks
 4 confidential and/or proprietary information.

5 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

6 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 7 responsive documents, the act of production of which is not protected by the Fifth Amendment.

8 **REQUEST NO. 9:**

9 All COMMUNICATIONS with Brian McClendon.

10 **RESPONSE TO REQUEST NO. 9:**

11 Mr. Levandowski incorporates his General Objections above as though set forth in this
 12 response. Mr. Levandowski objects to this request as vague, overly broad, and unduly
 13 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
 14 Mr. Levandowski further objects to this request to the extent it seeks information and documents
 15 protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-
 16 client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and
 17 any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the
 18 extent that it seeks confidential and/or proprietary information and/or documents that are
 19 protected by privacy rights under the United States Constitution or state or federal law, or other
 20 confidentiality protections.

21 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

22 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 23 responsive documents, the act of production of which is not protected by the Fifth Amendment.

24 **REQUEST NO. 10:**

25 All COMMUNICATIONS with Travis Kalanick.

26 **RESPONSE TO REQUEST NO. 10:**

27 Mr. Levandowski incorporates his General Objections above as though set forth in this
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1 response. Mr. Levandowski objects to this request as vague, overly broad, and unduly
 2 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
 3 Mr. Levandowski further objects to this request to the extent it seeks information and documents
 4 protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-
 5 client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and
 6 any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the
 7 extent that it seeks confidential and/or proprietary information and/or documents that are
 8 protected by privacy rights under the United States Constitution or state or federal law, or other
 9 confidentiality protections.

10 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

11 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 12 responsive documents, the act of production of which is not protected by the Fifth Amendment.

13 **REQUEST NO. 11:**

14 All COMMUNICATIONS with John Bares.

15 **RESPONSE TO REQUEST NO. 11:**

16 Mr. Levandowski incorporates his General Objections above as though set forth in this
 17 response. Mr. Levandowski objects to this request as vague, overly broad, and unduly
 18 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
 19 Mr. Levandowski further objects to this request to the extent it seeks information and documents
 20 protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-
 21 client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and
 22 any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the
 23 extent that it seeks confidential and/or proprietary information and/or documents that are
 24 protected by privacy rights under the United States Constitution or state or federal law, or other
 25 confidentiality protections.

26 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

27 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
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responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 12:

All COMMUNICATIONS with Cameron Poetzscher.

RESPONSE TO REQUEST NO. 12:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or proprietary information and/or documents that are protected by privacy rights under the United States Constitution or state or federal law, or other confidentiality protections.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 13:

All COMMUNICATIONS with Nina Qi.

RESPONSE TO REQUEST NO. 13:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the

1 extent that it seeks confidential and/or proprietary information and/or documents that are
 2 protected by privacy rights under the United States Constitution or state or federal law, or other
 3 confidentiality protections.

4 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

5 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 6 responsive documents, the act of production of which is not protected by the Fifth Amendment.

7 **REQUEST NO. 14:**

8 All COMMUNICATIONS with STROZ.

9 **RESPONSE TO REQUEST NO. 14:**

10 Mr. Levandowski incorporates his General Objections above as though set forth in this
 11 response. Mr. Levandowski objects to this request to the extent it seeks information and
 12 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
 13 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
 14 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
 15 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
 16 subject matter of this litigation.

17 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

18 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 19 responsive documents, the act of production of which is not protected by the Fifth Amendment.

20 **REQUEST NO. 15:**

21 All COMMUNICATIONS with any PERSON REGARDING STROZ.

22 **RESPONSE TO REQUEST NO. 15:**

23 Mr. Levandowski incorporates his General Objections above as though set forth in this
 24 response. Mr. Levandowski objects to this request because it is not calculated to lead to
 25 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
 26 objects to this request to the extent it seeks information and documents protected from discovery
 27 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
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1 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
 2 privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
 3 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.

4 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

5 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 6 responsive documents, the act of production of which is not protected by the Fifth Amendment.

7 **REQUEST NO. 16:**

8 All DOCUMENTS and COMMUNICATIONS REGARDING the MISAPPROPRIATED
 9 MATERIALS.

10 **RESPONSE TO REQUEST NO. 16:**

11 Mr. Levandowski incorporates his General Objections above as though set forth in this
 12 response. Mr. Levandowski objects to this request to the extent it seeks information and
 13 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
 14 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
 15 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
 16 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
 17 subject matter of this litigation.

18 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

19 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 20 responsive documents, the act of production of which is not protected by the Fifth Amendment.

21 **REQUEST NO. 17:**

22 All COMMUNICATIONS with Lior Ron REGARDING WAYMO, GOOGLE, or
 23 LiDAR.

24 **RESPONSE TO REQUEST NO. 17:**

25 Mr. Levandowski incorporates his General Objections above as though set forth in this
 26 response. Mr. Levandowski objects to this request to the extent it seeks information and
 27 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
 28 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense

1 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
 2 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
 3 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
 4 it seeks confidential and/or proprietary information and/or documents that are protected by
 5 privacy rights under the United States Constitution or state or federal law, or other confidentiality
 6 protections.

7 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

8 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 9 responsive documents, the act of production of which is not protected by the Fifth Amendment.

10 **REQUEST NO. 18:**

11 All COMMUNICATIONS with Lior Ron before August 18 REGARDING UBER.

12 **RESPONSE TO REQUEST NO. 18:**

13 Mr. Levandowski incorporates his General Objections above as though set forth in this
 14 response. Mr. Levandowski objects to this request as it does not include a year to limit the scope
 15 of the request. Mr. Levandowski further objects to this request as vague, overly broad, and
 16 unduly burdensome, in that it contains no limitations as to the subject matter of this litigation.
 17 Mr. Levandowski further objects to this request to the extent it seeks information and documents
 18 protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-
 19 client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and
 20 any other applicable privilege or doctrine. Mr. Levandowski further objects to this request to the
 21 extent that it seeks confidential and/or proprietary information and/or documents that are
 22 protected by privacy rights under the United States Constitution or state or federal law, or other
 23 confidentiality protections.

24 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

25 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 26 responsive documents, the act of production of which is not protected by the Fifth Amendment.

27 **REQUEST NO. 19:**

1 All COMMUNICATIONS with Colin Sebern REGARDING WAYMO, GOOGLE, or
2 LiDAR.

3 **RESPONSE TO REQUEST NO. 19:**

4 Mr. Levandowski incorporates his General Objections above as though set forth in this
5 response. Mr. Levandowski objects to this request to the extent it seeks information and
6 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
7 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
8 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
9 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
10 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
11 it seeks confidential and/or proprietary information and/or documents that are protected by
12 privacy rights under the United States Constitution or state or federal law, or other confidentiality
13 protections.

14 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

15 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
16 responsive documents, the act of production of which is not protected by the Fifth Amendment.

17 **REQUEST NO. 20:**

18 All COMMUNICATIONS with Don Burnette REGARDING WAYMO, GOOGLE, or
19 LiDAR.

20 **RESPONSE TO REQUEST NO. 20:**

21 Mr. Levandowski incorporates his General Objections above as though set forth in this
22 response. Mr. Levandowski objects to this request to the extent it seeks information and
23 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
24 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
25 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
26 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
27 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
28

1 it seeks confidential and/or proprietary information and/or documents that are protected by
2 privacy rights under the United States Constitution or state or federal law, or other confidentiality
3 protections.

4 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

5 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
6 responsive documents, the act of production of which is not protected by the Fifth Amendment.

7 **REQUEST NO. 21:**

8 All COMMUNICATIONS with Soren Juelsgaard REGARDING WAYMO, GOOGLE,
9 or LiDAR.

10 **RESPONSE TO REQUEST NO. 21:**

11 Mr. Levandowski incorporates his General Objections above as though set forth in this
12 response. Mr. Levandowski objects to this request to the extent it seeks information and
13 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
14 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
15 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
16 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
17 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
18 it seeks confidential and/or proprietary information and/or documents that are protected by
19 privacy rights under the United States Constitution or state or federal law, or other confidentiality
20 protections.

21 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

22 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
23 responsive documents, the act of production of which is not protected by the Fifth Amendment.

24 **REQUEST NO. 22:**

1 All COMMUNICATIONS with Ognen Stojanovski REGARDING WAYMO, GOOGLE,
2 or LiDAR.

3 **RESPONSE TO REQUEST NO. 22:**

4 Mr. Levandowski incorporates his General Objections above as though set forth in this
5 response. Mr. Levandowski objects to this request to the extent it seeks information and
6 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
7 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
8 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request
9 as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the
10 subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that
11 it seeks confidential and/or proprietary information and/or documents that are protected by
12 privacy rights under the United States Constitution or state or federal law, or other confidentiality
13 protections.

14 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

15 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
16 responsive documents, the act of production of which is not protected by the Fifth Amendment.

17 **REQUEST NO. 23:**

18 All agreements with any DEFENDANT.

19 **RESPONSE TO REQUEST NO. 23:**

20 Mr. Levandowski incorporates his General Objections above as though set forth in this
21 response. Mr. Levandowski objects to this request to the extent it seeks information and
22 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
23 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
24 doctrine, and any other applicable privilege or doctrine. Mr. Levandowski further objects to this
25 request to the extent that it seeks confidential and/or proprietary information and/or documents
26 that are protected by privacy rights under the United States Constitution or state or federal law, or
27 other confidentiality protections.

1 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

2 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
3 responsive documents, the act of production of which is not protected by the Fifth Amendment.

4 **REQUEST NO. 24:**

5 All agreements with SANDSTONE.

6 **RESPONSE TO REQUEST NO. 24:**

7 Mr. Levandowski incorporates his General Objections above as though set forth in this
8 response. Mr. Levandowski objects to this request because it is not calculated to lead to
9 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
10 objects to this request to the extent it seeks information and documents protected from discovery
11 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
12 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
13 privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
14 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
15 Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or
16 proprietary information and/or documents that are protected by privacy rights under the United
17 States Constitution or state or federal law, or other confidentiality protections.

18 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

19 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
20 responsive documents, the act of production of which is not protected by the Fifth Amendment.

21 **REQUEST NO. 25:**

22 All agreements with APPARATE INTERNATIONAL.

23 **RESPONSE TO REQUEST NO. 25:**

24 Mr. Levandowski incorporates his General Objections above as though set forth in this
25 response. Mr. Levandowski objects to this request because it is not calculated to lead to
26 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
27 objects to this request to the extent it seeks information and documents protected from discovery
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1 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
2 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
3 privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
4 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
5 Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or
6 proprietary information and/or documents that are protected by privacy rights under the United
7 States Constitution or state or federal law, or other confidentiality protections.

8 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

9 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
10 responsive documents, the act of production of which is not protected by the Fifth Amendment.

11 **REQUEST NO. 26:**

12 All agreements with POUCH HOLDINGS.

13 **RESPONSE TO REQUEST NO. 26:**

14 Mr. Levandowski incorporates his General Objections above as though set forth in this
15 response. Mr. Levandowski objects to this request because it is not calculated to lead to
16 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
17 objects to this request to the extent it seeks information and documents protected from discovery
18 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
19 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
20 privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly
21 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
22 Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or
23 proprietary information and/or documents that are protected by privacy rights under the United
24 States Constitution or state or federal law, or other confidentiality protections.

25 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

26 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
27 responsive documents, the act of production of which is not protected by the Fifth Amendment.
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REQUEST NO. 27:

All agreements with DOGWOOD LEASING.

RESPONSE TO REQUEST NO. 27:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation. Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or proprietary information and/or documents that are protected by privacy rights under the United States Constitution or state or federal law, or other confidentiality protections.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 28:

All agreements with Lior Ron.

RESPONSE TO REQUEST NO. 28:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly

1 burdensome, in that it contains no limitations as to time or the subject matter of this litigation.
 2 Mr. Levandowski further objects to this request to the extent that it seeks confidential and/or
 3 proprietary information and/or documents that are protected by privacy rights under the United
 4 States Constitution or state or federal law, or other confidentiality protections.

5 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

6 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 7 responsive documents, the act of production of which is not protected by the Fifth Amendment.

8 **REQUEST NO. 29:**

9 All agreements with John Gardner.

10 **RESPONSE TO REQUEST NO. 29:**

11 Mr. Levandowski incorporates his General Objections above as though set forth in this
 12 response. Mr. Levandowski objects to this request because it is not calculated to lead to
 13 discoverable material, and constitutes an improper fishing expedition. Mr. Gardner is Mr.
 14 Levandowski's personal attorney. Mr. Levandowski objects to this request to the extent it seeks
 15 information and documents protected from discovery under Mr. Levandowski's attorney-client
 16 privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any
 17 other applicable privilege or doctrine.

18 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

19 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
 20 responsive documents, the act of production of which is not protected by the Fifth Amendment.

21 **REQUEST NO. 30:**

22 All agreements with Ogden Stojanovski.

23 **RESPONSE TO REQUEST NO. 30:**

24 Mr. Levandowski incorporates his General Objections above as though set forth in this
 25 response. Mr. Levandowski objects to this request because it is not calculated to lead to
 26 discoverable material, and constitutes an improper fishing expedition. Mr. Stojanovski is an
 27 attorney. Mr. Levandowski objects to this request to the extent it seeks information and
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documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to time or the subject matter of this litigation.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

After a reasonable, diligent search, Mr. Levandowski will produce non-privileged, responsive documents, the act of production of which is not protected by the Fifth Amendment.

REQUEST NO. 31:

All DOCUMENTS or COMMUNICATIONS after January 27, 2016 REGARDING WAYMO's LiDAR.

RESPONSE TO REQUEST NO. 31:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine.

Subject to and without waiving his objections, Mr. Levandowski responds as follows:

REQUEST NO. 32:

All COMMUNICATIONS with any PERSON REGARDING THIS CASE.

RESPONSE TO REQUEST NO. 32:

Mr. Levandowski incorporates his General Objections above as though set forth in this response. Mr. Levandowski objects to this request because it is not calculated to lead to discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further objects to this request to the extent it seeks information and documents protected from discovery under the attorney-client privilege, the work-product doctrine, the common-interest and joint-defense doctrine, and any other applicable privilege or doctrine. Mr. Levandowski objects to this

1 request as vague, overly broad, and unduly burdensome, in that it contains no limitations as to
2 time or the individual(s) with whom the communications were made.

3 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

4 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
5 responsive documents, the act of production of which is not protected by the Fifth Amendment.

6 **REQUEST NO. 33:**

7 All DOCUMENTS belonging to WAYMO in YOUR possession, custody, or control.

8 **RESPONSE TO REQUEST NO. 33:**

9 Mr. Levandowski incorporates his General Objections above as though set forth in this
10 response. Mr. Levandowski objects to this request to the extent it seeks information and
11 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege.

12 **REQUEST NO. 34:**

13 All DOCUMENTS belonging to GOOGLE in YOUR possession, custody, or control.

14 **RESPONSE TO REQUEST NO. 34:**

15 Mr. Levandowski incorporates his General Objections above as though set forth in this
16 response. Mr. Levandowski objects to this request to the extent it seeks information and
17 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege.

18 **REQUEST NO. 35:**

19 All DOCUMENTS and COMMUNICATIONS referring or relating to DOCUMENTS
20 belonging to WAYMO in YOUR possession, custody, or control.

21 **RESPONSE TO REQUEST NO. 35:**

22 Mr. Levandowski incorporates his General Objections above as though set forth in this
23 response. Mr. Levandowski objects to this request to the extent it seeks information and
24 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
25 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
26 doctrine, and any other applicable privilege or doctrine;

27 **REQUEST NO. 36:**

1 All DOCUMENTS and COMMUNICATIONS referring or relating to DOCUMENTS
2 belonging to GOOGLE in YOUR possession, custody, or control.

3 **RESPONSE TO REQUEST NO. 36:**

4 Mr. Levandowski incorporates his General Objections above as though set forth in this
5 response. Mr. Levandowski objects to this request to the extent it seeks information and
6 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
7 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
8 doctrine, and any other applicable privilege or doctrine;

9 **REQUEST NO. 37:**

10 All COMMUNICATIONS and DOCUMENTS REGARDING any attempt to conceal,
11 hide, or destroy the MISAPPROPRIATED MATERIALS.

12 **RESPONSE TO REQUEST NO. 37:**

13 Mr. Levandowski incorporates his General Objections above as though set forth in this
14 response. Mr. Levandowski objects to this request to the extent it seeks information and
15 documents protected from discovery under Mr. Levandowski's Fifth Amendment privilege, the
16 attorney-client privilege, the work-product doctrine, the common-interest and joint-defense
17 doctrine, and any other applicable privilege or doctrine;

18 **REQUEST NO. 38:**

19 All COMMUNICATIONS and DOCUMENTS REGARDING your termination from
20 UBER.

21 **RESPONSE TO REQUEST NO. 38:**

22 Mr. Levandowski incorporates his General Objections above as though set forth in this
23 response. Mr. Levandowski objects to this request because it is not calculated to lead to
24 discoverable material, and constitutes an improper fishing expedition. Mr. Levandowski further
25 objects to this request to the extent it seeks information and documents protected from discovery
26 under Mr. Levandowski's Fifth Amendment privilege, the attorney-client privilege, the work-
27 product doctrine, the common-interest and joint-defense doctrine, and any other applicable
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1 privilege or doctrine. Mr. Levandowski further objects to this request to the extent that it seeks
2 confidential and/or proprietary information and/or documents that are protected by privacy rights
3 under the United States Constitution or state or federal law, or other confidentiality protections.

4 Subject to and without waiving his objections, Mr. Levandowski responds as follows:

5 After a reasonable, diligent search, Mr. Levandowski will produce non-privileged,
6 responsive documents, the act of production of which is not protected by the Fifth Amendment.

7
8 Dated: July 7, 2017

Respectfully Submitted,

9 /s/ Miles Ehrlich

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